

# EXHIBIT G

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN  
GREEN BAY DIVISION**

JACQUELYN A. VANDEHEY, and  
MICHELLE L. O'LAIRE, on behalf of  
themselves and all others similarly situated,

Plaintiffs,

vs.

ASSET RECOVERY SOLUTIONS, LLC, an  
Illinois limited liability company; VELOCITY  
INVESTMENTS LLC, a New Jersey limited  
liability company; and, JOHN AND JANE  
DOES NUMBERS 1 THROUGH 25,

Defendants.

Case No.: 1:18-cv-00144-WCG

**DECLARATION OF [VELOCITY INVESTMENTS, LLC]**

I, W. Peter Ragan, Jr., does hereby declare:

1. I am over the age of 18 and of sound mind.
2. I am a Vice President of the Velocity Investments, LLC ("Velocity"). I am authorized to make this declaration on Velocity's behalf. I make this declaration based on my personal knowledge and my review of the business records maintained by Velocity and, if called as a witness, I could and would testify competently to the contents of this declaration and the attached records.
3. Velocity purchased the loans issued to Jacquelyn A. Vandehey and Michelle L. O'Laire by WebBank (and later sold to Prosper Funding, LLC) on November 22, 2016 and January 23, 2017, respectively. As part of that purchase, Velocity received documents specific to these loans. I have access to the business records concerning these loans.
4. The business records attached to the memorandum in support of the motion to compel arbitration and deny the motion for class certification made by Asset Recovery Solutions,

LLC and Velocity are maintained in the ordinary course of business of Velocity. The facts set forth in this declaration are true and correct to the best of my knowledge, which is based on my personal knowledge obtained through my employment with Velocity and my review of the business records.

I declare under penalty of perjury, under the laws of the United States, that the foregoing is true and correct. Executed this 18<sup>th</sup> day of June, 2018.

DATE

6/18/18

W. Peter Ragan, Jr.

